

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

RUTH MIRIAM MALDONADO ORTIZ

DEBTOR (S)

CASE NO: 09-08766 ESL

CHAPTER 13 (ASSET CASE)

**REQUEST FOR AUTHORIZATION & NOTICE
PURSUANT TO 11 USC § 363 & RULE 6004**

TO THE HONORABLE COURT:

COME NOW debtor through the undersigned attorney, and respectfully avers and prays as follows:

1. On October 15th, 2009 the Debtor filed the instant bankruptcy petition. (Docket No.1)
2. Debtor's received \$4,674.00 for her 2009 State Tax returns which she is asking to retain in order to make some indispensable changes to her home.
3. Debtor resides in Zumbador Street #20, Santa Rosa ward in Vega Baja. Due to the high incidence in crime debtor was obliged to buy guard dogs for protection (German Shepperds) which have escape several times due to the fact that they don't have a good fence. This causes another problem and is debtor's fear that the dogs may harm someone which becomes a risk.
4. In light of the above stated, debtor is asking to use the complete tax refund to be able to complete the fence in order to take care of their safety and to be able to ensure that the guard dogs don't hurt any one. *Enclosed Please Find Estimates for the Fence and Debtor's Explanatory letter.*
5. Debtor's respectfully requests an Order from this Honorable Court to retain the Tax refunds in the amount of \$4,674.00. Moreover, allowance of this request will not negatively affect the plan inasmuch as it would still pay unsecured creditors more than what they would receive in a Chapter 7 scenario.

NOTICE

“Parties in interest are notified they have seven (7) days to reject a proposed modification of a plan and request a hearing. If no opposition is filed within the prescribed period of time, the Court will enter and order granting the motion upon the filing of a certificate of service by the movant that adequate notice was given. Should an opposition be timely filed. The Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejections shall be denied”.

WHEREFORE, the debtor respectfully requests that this Court enter an Order to allow the extraordinary expense as necessary expense and thus allow the Debtor's to retain the \$4,674.00 from their tax refunds with any other appropriate relief this Court deems appropriate.

I HEREBY CERTIFY that this document was filed electronically on this same date using the CM/ECF system which will send notice of such filing to CM/ECF participants: Jose R. Carrion Ch. 13 Trustee, ecfmail@ch13-pr.com, and that true copy of this Request has been mailed to the creditors and parties in interest on the attached matrix without exhibits. These exhibits are available through the Court's electronic imaging.

This 10th, day of July, 2010.

RESPECTFULLY SUBMITTED.

/S/ MARILYN VALDES ORTEGA
MARILYN VALDES ORTEGA
USDC PR 214711
P.O.Box 195596
San Juan, PR 00919-5596
Tel. (787) 758-4400
Fax. (787) 763-0144
E-mail: valdeslaw@prtc.net

25 de junio de 2010

Sr. Jose R. Carrión
Chapter 11 & 13
San Juan, Puerto Rico

Estimado señor Carrión:

La alta incidencia de robos domiciliarios en nuestro lugar de residencia, nos han obligado a tener canes para la vigilancia de la misma. En varias ocasiones hemos tenido que ir tras ellos, ya que no tenemos una buena verja y se nos han escapado. Aunque nuestros shepperd poseen todas sus vacunas, tenemos temor que puedan hacer daño a alguna persona, lo cual sería un riesgo para nosotros lo que no debemos ni queremos que suceda.

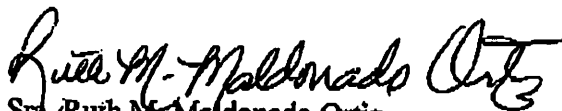
Por la razón antes expuesta, solicitamos encarecidamente que se nos permita utilizar el reintegro que recibimos de las planillas para completar la construcción de una verja en la residencia. Al momento nuestra residencia no está verjada, por lo que hemos tenido que recurrir a hacer una verja improvisada con paneles y zinc para evitar que nuestros canes se nos escapen.

El frente de la casa tiene verja y una parte del lado izquierdo. Nos falta por verjar la parte de atrás de la residencia y el lado derecho.

Adjunto estamos sometiendo una cotización de los costos en que incurriríamos para la construcción de la misma.

Gracias anticipadas por su atención a este asunto.

Cordialmente,


Sra. Ruth M. Maldonado Ortiz
Tel. 787-598-4821

cf: Lcda. Valdés

COTIZACIÓN

Construcción de verja para la residencia de Edwin Rivera y Ruth M. Maldonado, la cual está localizada en la calle Zumbador #20, Bo. Santa Rosa en Vega Baja. La construcción es para un área de 1,553 mts. (solo aplica el lado derecho de la residencia y la parte posterior).

<i>Cantidad</i>	<i>Materiales</i>	<i>Costo</i>
6 rollos	Cyclone Fence	660.00
30	Tubos 1"	239.70
30	Tubos 2"	509.70
2,580	Bloques	1651.20
50 sacos	Cemento	214.50
3 mts.	Areña	105.00
2 mts	Piedra	70.00
18	Uniones (T)	53.82
Labor, incluyendo un ayudante		1,600.00
Costo Total		\$5,103.72

Cualquier información adicional, favor de comunicarse con el suscribiente al 787-346-2930.

Cordialmente,


Sr. Jonathan Gamino

FECHA	NUMERO DE COMPROBANTE	DESCRIPCION/CONTRATO	FACTURACION	IMPORTE DEL COMPROBANTE
28/05/10	000061	REINT 2009 5593	---	\$****4,674.00

	DIA	MESE	AÑO
15169981	28	05	10
NUMERO DE CHEQUE	FECHA EMISION		

ESTADO LIBRE ASOCIADO DE PUERTO RICO

RETENGA ESTE TALON
PARA SUS RECORDS.

Ver al dorso para detalles de los mecanismos de seguridad / See reverse side for complete security features.

Modelo 307/343
ENERO 2009

REINT 2009

DIA	MESE	AÑO
28	05	10

FECHA EMISION

DIA	MESE	AÑO
28	11	10

VENCE EN

NUMERO DE CHEQUE
15169981

IMPORTE

\$****4,674.00

CUATRO MIL SEISCIENTOS SETENTA Y CUATRO DOLARES
CON NO/100

EDWIN RIVERA TIRADO Y
RUTH M. VALDONADO

584355593

BGF

Juan Carlos R.
SECRETARIO DE HACIENDA

151699815 021502118 325070522

Label Matrix for local noticing
0104-3
Case 09-08766-BSL13
District of Puerto Rico
Old San Juan
Sat Jul 10 11:16:12 AST 2010

US Bankruptcy Court District of P.R.
U.S. Post Office and Courthouse Building
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

CARIBE FEDERAL CREDIT UNION
195 O NEILL STREET
SAN JUAN, PR 00918-2404

DEPARTAMENTO DEL TRABAJO
AVE. MUOZ RIVERA 505
HATO REY, PR 00918-3352

FIA Card Services aka Bank of America
c/o Becket and Lee LLP
POB 3001
Malvern PA 19355-0701

MONEY EXPRESS
PO BOX 9146
SAN JUAN, PR 00908-0146

TD Retail Card Services
c/o Creditors Bankruptcy Service
P O Box 740933
Dallas,Tx 75374-0933

MARILYN VALDES ORTEGA
VALDES-ORTEGA
P O BOX 195596
SAN JUAN, PR 00919-5596

R&G MORTGAGE CORPORATION
CARDONA JIMENEZ LAW OFFICE
PO BOX 9023593
SAN JUAN, PR 00902-3593

CitiFinacial Inc
P.O. Box 70919
Charlotte, NC 28272-0919

CITIFINANCIAL
RETAIL SERVICES DE PUERTO RICO
PO BOX 71328
SAN JUAN, PR 00936-8428

FEDERAL LITIGATION DEPT OF JUSTICE
PO BOX 9020192
SAN JUAN, PR 00902-0192

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 21126
PHILADELPHIA PA 19114-0326

MUEBLERIAS BERRIOS
PO BOX 674
CIDRA, PR 00739-0674

THE HOME DEPOT
PROCESSING CENTER
DES MOINES, IA 50364-0500

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901-1938

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928-1382

ADVANCE AUTO PARTS
PO BOX 609
MEMPHIS, TN 38101-0609

DEPARTAMENTO DE HACIENDA
PO BOX 9024140
OFICINA 424 B
SAN JUAN, PR 00902-4140

FIA CARD SERVICES
PO BOX 15019
WILMINGTON, DE 19886-5019

LCDO. IVAN SANCHEZ LIMARDO
SANCHEZ- LIMARDO LAW OFFICE
PO BOX 363046
SAN JUAN, PR 00936-3046

RG MORTGAGE
PO BOX 362394
SAN JUAN, PR 00936-2394

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

RUTH MIRIAM MALDONADO ORTIZ
PO BOX 2129
VEGA BAJA, PR 00694-2129

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

INTERNAL REVENUE SERVICE
MERCANTIL PLAZA BLDG, ROOM 1014
2 PONCE DE LEON AVE. STOP 27 1/2
SAN JUAN, PR 00918-1693

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)MALDONADO ORTIZ, RUTH MIRIAM

(d)R&G MORTGAGE CORPORATION
CARDONA-JIMENEZ LAW OFFICE
P.O. BOX 9023593
SAN JUAN, PR 00902-3593

(d)RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN PR 00928-1382

End of Label Matrix	
Mailable recipients	23
Bypassed recipients	3
Total	26